

## **REMARKS/ARGUMENTS**

### **I. Introduction:**

Claims 1, 7, 11, 17, 21, 27, 31, and 32 are amended herein. Claims 1-38 are currently pending.

### **II. Claim Rejections – 35 U.S.C. 102:**

Claims 1, 6, 11, 16, 21, 26, 31, and 33-38 stand rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,856,974 (Gervais et al.).

Gervais et al. disclose an internetwork address mapping gateway. The address mapping gateway maintains an address mapping table that provides a cross-reference between (1) a source node address and network number of the local network in which the node resides, and (2) a gateway-mapped node address generated by the address mapping gateway. Upon receipt of a packet from the source node, the address mapping gateway performs an address translation to a globally-unique network layer address. Upon receipt of a packet destined for a destination node in the domain, the gateway performs a reverse translation to the originally assigned network layer address.

Claims 1, 11, 21, and 31 have been amended to specify that one of the globally significant IP address and locally significant IP address are selected for use in forwarding the packet and that both addresses are configured for use in forwarding the packet without address translation.

Gervais et al. do not disclose formatting an IP packet to include a globally significant IP address identifying a realm *and* a locally significant IP address identifying a destination of the packet within the realm. In contrast, Gervais et al. operate to perform a conventional mapping between interior private addresses and public globally significant addresses (see, for example, col. 4, line 66 – col. 5, line 12, and col. 7, lines 52 – 58). The packet used in Gervais et al. contains a source node address and a network number. The network number is not a globally significant address that can be used to forward a

packet. Both the source node address and network number are used in the address mapping gateway which performs address translations functions. Gervais et al. do not select an address in the packet to use to forward the packet. In contrast, to applicants' invention, Gervais et al. only include one address in the packet. The address contained in the packet, along with other information, such as a network number, are used in the mapping gateway.

Applicants' invention, as set forth in the claims, is particularly advantageous in that it provides for interoperation between realms employing private local addresses and realms employing globally unique addresses while allowing nodes outside the private realm to initiate sessions with nodes inside the private realms without the need for mapping IP addresses between unregistered locally significant addresses and globally significant registered addresses.

Accordingly, claims 1, 6, 11, 16, 21, 26, and 31 are submitted as not anticipated by Gervais et al.

Claims 33-38, depending either directly or indirectly from claim 1, are submitted as patentable for at least the reasons discussed above with respect to claim 1.

Claims 7-9, 17-19, 27-29, and 32 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,418,476 (Luciani).

Luciani discloses a method for synchronizing network address translator (NAT) tables using OSPF (Open Shortest Path First) opaque LSA (Link State Advertisement). Luciani uses conventional NAT to provide network address translator functionality at border routers (see, e.g., col. 2, line 61 - col. 3, line 18). Mappings are provided between interior private addresses and public globally significant addresses.

Claim 7 is directed to a method for operating a gateway node to handle a received packet and includes extracting a globally significant destination address from a destination address field of the packet. If the globally significant destination address identifies a realm directly attached to the gateway node, a locally significant destination address is extracted from the packet and placed in the destination address field and the

packet is forwarded to a local destination within the realm. Claim 7 has been amended to specify that the locally significant destination address and locally significant destination address are both contained within the packet so that the packet is forwarded to the local destination address without obtaining an address through network address translation.

There is no disclosure in Luciani of extracting a globally significant destination address from a destination address field of a packet received at a border router and placing the locally significant destination address in the destination address field. In contrast to the method set forth in claim 7, Luciani uses a network address translation table at the border router to identify the local IP address that is mapped to a globally unique IP address.

Accordingly, claims 7, 17, 27, and 32, and the claims depending therefrom, are submitted as not anticipated by Luciani.

### III. Claim Rejections – 35 U.S.C. 103:

Claims 2-4, 12-14, and 22-24 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Gervais in view of U.S. Patent No. 6,304,913 (Rune).

Claims 2-4, 12-14, and 22-24 are submitted as patentable for at least the reasons set forth above with respect to their base claims.

Rune simply uses a conventional DNS server to replace a common host name with an IP address. There is no teaching of resolving both a globally significant IP address and a locally significant IP address. Furthermore, there is no discussion of resolving an IP address from one component of a name.

Accordingly, claims 2-4, 12-14, and 22-24 are submitted as patentable over Gervais and Rune.

Applicants respectfully submit that the other reference cited, including U.S. Patent Publication No. 2002/0169887 (McLampy et al.), do not remedy the deficiencies of the

primary references. Claims 5, 15, and 25 are therefore submitted as patentable over the cited references, for the reasons discussed above.

IV. Conclusion:

For the foregoing reasons, Applicants believe that all of the pending claims are in condition for allowance and should be passed to issue. If the Examiner feels that a telephone conference would in any way expedite the prosecution of the application, please do not hesitate to call the undersigned at (408) 399-5608.

Respectfully submitted,



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